

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

RONALD HYLTON,)	
)	
Plaintiff,)	
)	
v.)	
)	Civil Action File No.
PILOT CORPORATION D/B/A as)	
PILOT TRAVEL CENTERS, LLC,)	
)	
Defendant.		

NOTICE OF REMOVAL

COMES NOW, Defendant Pilot Corporation (incorrectly named as Pilot Corporation d/b/a Pilot Travel Centers, LLC), Defendant in the above-styled suit, and within the time prescribed by law, file this Notice of Removal pursuant to 28 U.S.C. §1441, and respectfully shows the Court the following:

1.

Plaintiff Ronald Hylton (“Plaintiff”) has commenced this action in the State Court of DeKalb County, Georgia, under the Civil Action File No. 13A47615-4. This suit involves a sum in excess of \$75,000, exclusive of interest and costs.

2.

Plaintiff is an individual who is a citizen of the State of Wisconsin.

3.

Defendant is a corporation organized under the laws of the State of Tennessee with its principal place of business in the State of Tennessee.

4.

As stated above, the amount in controversy exceeds the sum of \$75,000 exclusive of interest and costs.

5.

The aforementioned civil action is a civil action of which this Court has original jurisdiction under the provisions of Title 28 of the United States Code § 1332 and, accordingly, is one which may be removed to this Court by Defendant pursuant to the provisions of Title 28 of the United States Code § 1441, in that it is a civil action in which the matter in controversy exceeds the sum of \$75,000 exclusive of interests and costs, and is between citizens of different states.

6.

Defendant first received the Summons and Complaint on June 27, 2013. This Notice is filed within thirty days of Defendants receipt of the Summons and Complaint pursuant to the requirements of 28 U.S.C. § 1446(b).

7.

Defendant attaches the Civil Cover Sheet as Exhibit A. Defendant attaches copies of all process, pleadings and orders served upon it in this case, such copies being marked as Exhibit B. In addition, Defendant shows it has already answered the lawsuit in the state-court action referenced above and a copy of that Answer and the Jury Demand is attached as Exhibit C.

WHEREFORE, Defendant prays this case be removed to the United States District Court for the Northern District of Georgia, Atlanta Division.

This 29th day of July, 2013.

CARLOCK, COPELAND & STAIR, LLP

By: /s/Katherine L. Holley
DAVID F. ROOT
Georgia Bar No. 614125
KATHERINE L. HOLLEY
Georgia Bar No. 978015
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404-522-8220

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P. O. Box 56887
Atlanta, Georgia 30343-0887

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the within and foregoing pleading upon all parties to this matter by Court Electronic Filing to counsel of record as follows:

Arman M. Deganian
THE ORLANDO FIRM, P.C.
Decatur Court
Suite 400
315 Ponce de Leon Avenue
Decatur, Georgia 30030

This 29th day of July, 2013.

By: /s/ Katherine L. Holley
DAVID F. ROOT
Georgia Bar No. 614125
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